

M/D 1

**RECEIVED**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA

703 APR 30 A 10:58

Jonathan Gladney 228295 DEBRA P. HACKETT, CLK  
 Full name and prison name of Plaintiff(s) U.S. DISTRICT COURT  
 ) MIDDLE DISTRICT ALA

v.

Lieutenant Willie BurksCIVIL ACTION NO. 2:18-cv-442-WKW-WC  
 (To be supplied by Clerk of U.S. District Court)

NURSE JANE DOE to the Pleader of Corizon  
Health Care UNIT STATION CORRECTIONAL  
FACILITY EMPLOYEE ON 8/30/16 AT 10:PM  
Perform Body Chart Documentation  
 Name of person(s) who violated your constitutional rights. (List the names of all the person.)

## I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES  No
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES  NO
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

## 1. Parties to this previous lawsuit:

Plaintiff(s) Jonathan Gladney ProseDefendant(s) JOSEPH HEADLEY, WARDEN, ET AL.Lieutenant Walter Posey, ET AL.

## 2. Court (if federal court, name the district; if state court, name the county)

UNITED STATES District CourtMIDDLE District of Alabama Northern Division

3. Docket number Civil ACTION NO 2:17-CV-21-MHT
4. Name of judge to whom case was assigned Honorable Judge  
MYRON H THOMPSON
5. Disposition (for example: was the case dismissed? Was it appealed? Is it still pending?) Still Pending
6. Approximate date of filing lawsuit 1/11/17
7. Approximate date of disposition 2/13/18

II. PLACE OF PRESENT CONFINEMENT LIMESTONE Correctional Facility

28779 Nick Davis Road HARVEST, ALABAMA 35749

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED ELMORE Correctional Facility 3520 Marion Spillway Road ELMORE, Alabama 36025

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

NAME	ADDRESS
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1. WARDEN Joseph HEADLEY, ET.AL 3520 Marion Spillway Rd ELMORE, ALA
2. Lt' Walter Poscy, ET.AL 3520 Marion Spillway Rd ELMORE, ALA 36025
3. Lt' Willie Burks . 3520 Marion Spillway Rd. ELMORE, ALA 36025
4. Nurse JANE DOE to the Pleader NAME UNKNOWN EMPLOYED BY
5. Corizon Health Care STATION Correctional UNIT.

6. \_\_\_\_\_

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED 8/30/16

August 30 / 2016

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Gladney contends the ELMORE Correctional Security STAFF FAILED to Protect AND Denied Gladney of Medical Treatment,

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

ON 8/30/16 AT 10:20 AM GLADNEY WAS ROBBED AND ASSAULTED BY INMATE DAVISON WILLIAMS 295136 AT ELMORE CORRECTIONAL FACILITY, WHOM WAS IN A UNAUTHORIZED AREA AT 10:20 AM, GLADNEY AND INMATE WILLIAMS 295136 WAS ESCORTED INTO THE ELMORE CORR. FAC. SHIFT OFFICE ON 8/30/16, AT 4:35 PM ON 8/30/16 GLADNEY 228295 & WILLIAMS 295136 WAS INVOLVED IN ANOTHER ALTERCATION IN A-2 DORMITORY WHERE INMATE WILLIAMS 295136 DID NOT BELONG VIOLATION OF GLADNEY DUE PROCESS LAW

GROUND TWO: GLADNEY CONTENDS HE WAS DENIED MEDICAL TREATMENT AND REASONABLE SAFETY, DESHANEY V. WINNEBAGO COUNTY DEPT OF SOC. SERVS 498 U.S. 189. 109 S.Ct 998. 103 LED 2d 249 (19.89).

SUPPORTING FACTS: ON 8/30/16 AT 4:35 PM OFFICER MOSS STATED HE OBSERVED SEVERAL INMATES ASSAULTING INMATE JONATHAN GLADNEY 228295. GLADNEY CONTENDS HE WAS DENIED MEDICAL TREATMENT AT THE TIME OF THE INCIDENT. GLADNEY ALSO CONTENDS HE WAS DENIED ALL MEDICAL TREATMENT BY THE STATION HEALTH CARE NURSE WHOM PERFORMED GLADNEY BODY CHART DOCUMENTATION FORM ON 8/30/16 AT 10: PM

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GROUND THREE: GLADNEY CONTENDS HE HAS A CONSTITUTIONAL PROTECTED RIGHT TO MEDICAL CARE AND REASONABLE SAFETY

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SUPPORTING FACTS: GLADNEY CONTENDS THE INCIDENT OCCURRED AT 4:35 PM ON 8/30/16 GLADNEY WAS ORDERED FOR MEDICAL EXAMINATION <sup>NOT</sup> UNTIL 10: PM ON 8/30/16 SIX HOURS LATER, THEN AT 10: PM GLADNEY WAS DENIED ALL MEDICAL <sup>TREATMENT</sup> BY THE NURSE WHOM PERFORMED GLADNEY BODY CHART DOCUMENTATION FORM A VIOLATION OF GLADNEY'S CONSTITUTIONAL PROTECTED RIGHTS.

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STATE BRIEFLY The Facts which Support his Ground.

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Time, PLACE AND MANNER AND PERSON involved

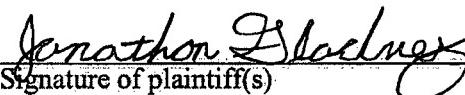
ON 8/30/16 AT 4:35 PM GLADNEY CONTENTS HE WAS ASSAULTED BY SEVERAL INMATES IN A-2 DORMITORY. AT 4:36 PM 2ND SHIFT COMMANDER CORRECTIONAL LIEUTENANT WILLIE M. BURKS REPORTED TO A-2 DORMITORY GLADNEY CONTENTS HE HAD BEEN BEAT IN THE HEAD FACE AND JAW WITH STICKS AND FIST BY SEVERAL INMATES THE FRIENDS OF GLADNEY ATTACKER GLADNEY CONTENTS HE WAS DENIED MEDICAL TREATMENT AT THE TIME OF THE INCIDENT BY LIEUTENANT WILLIE M. BURKS.

GLADNEY CONTENTS THAT NURSE JANE DOE OF STATON HEALTH CARE UNIT ON 8/30/16 AT 10:PM DID DENIE INMATE JONATHON GLADNEY 228295 OF ANY AND ALL MEDICAL TREATMENT WHICH CLEARLY VIOLATED INMATE GLADNEY CONSTITUTIONAL RIGHTS.

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.  
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Gladney contends HE wishes to SUE Lt. Willie Burks for Denying inmate Jonathan Gladney 228295 Medical Treatment at the time of the incident.  
Gladney contends He wishes to SUE The NURSE who Denied ed  
Gladney of ANY And ALL Medical Treatment."

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Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 4-25-18  
(Date)

  
Signature of plaintiff(s)

Schow Bladney 228295  
LIMESTONE Correctional Facility  
28779 Nick Davis Road  
HARVEST, Alabama 35749

Ms Debra P. HICKEREE

U.S. District Court Clerk  
Middle District of Alabama  
One Church Street - B-110  
Montgomery, Alabama

36104

affidavit from  
of Alabama State Prison. The contents  
have not been evaluated, and the Alabama  
**Department of Corrections is not**  
**responsible for the substance or content**  
**of the enclosed communication.**

